

PRIS-14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner) (Mod 7/19)

FILED

JUN 09 2023

UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

**Mark C. McCartt, Clerk
U.S. DISTRICT COURT**

Case No.

23-CV-19-CVE-CDL

(to be filled in by the Clerk's Office)

TOBIN DON LEMMONS

Plaintiff(s)

PRO-SE

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

\ DOUG GROVE-MILLER PAWNEE COUNTY DETENTION OFFICER et. al.

\ JERRY SKIDGEL PAWNEE COUNTY COMMISSIONER et. al.

DARRIN VARNELL PAWNEE COUNTY SHERIFF et. al.

PAWNEE COUNTY JAIL et. al. DETENTION OFFICERS et. al.

BYSTANDERS WILLIAM HAWTHORNE AND CAMERON DENNIS

CITY OF PAWNEE et. al. Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

TURN KEY MEDICAL PROVIDER > DR. MAL

FILED

JAN 12 2023

**Mark C. McCartt, Clerk
U.S. DISTRICT COURT**

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis. PRO-SE IMMEDIATE DANGER ADVISMENT

PRIS-14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner) (Mod 7/19)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

TOBIN DON LEMMONS

All other names by which
you have been known:

N/A

ID Number

PAWNEE COUNTY JAIL

Current Institution

PAWNEE COUNTY JAIL

Address

500 HARRISON STREET

PAWNEE

OKLA

74058

Civ

State

Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

DOUG GROVE-MILLER

Job or Title (*if known*)

PAWNEE COUNTY DETENTION OFFICER et al.

Shield Number

UNKNOWN

Employer

PAWNEE COUNTY SHERIFFS OFFICE

Address

500 HARRISON

PAWNEE

OKLA

74058

Civ

State

Zip Code

☒ Individual capacity☒ Official capacity**Defendant No. 2**

Name

DARRIN VARRELL

Job or Title (*if known*)

PAWNEE COUNTY SHERIFFS OFFICE (SHERIFF)

Shield Number

UNKNOWN

Employer

PAWNEE COUNTY SHERIFFS OFFICE, PAWNEE COUNTY et

Address

500 HARRISON

PAWNEE

OKLA

74058

Civ

State

Zip Code

☒ Individual capacity☒ Official capacity

PRIS-14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner) (Mod 7/19)

Defendant No. 3

Name PAWNEE COUNTY COMMISSIONER JERRY SKIDGEL
 Job or Title (if known) PAWNEE COUNTY COMMISSIONER
 Shield Number UNKNOWN
 Employer PAWNEE COUNTY BOARD OF COUNTY COMMISSIONERS et al.
 Address 500 S. HARRISON ROOM #104
PAWNEE OKLA. 74058
 City State Zip Code
☒ Individual capacity ☒ Official capacity

Defendant No. 4

Name PAWNEE COUNTY JAILERS et al. 'JOHN DOE'
 Job or Title (if known) PAWNEE COUNTY DETENTION OFFICERS et al.
 Shield Number UNKNOWN
 Employer PAWNEE COUNTY SHERIFFS OFFICE et al.
 Address 500 HARRISON
PAWNEE OKLA. 74058
 City State Zip Code
☒ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)
☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

COUNT (I) VIOLATION OF OFRA (FREEDOM OF RELIGION ACT), OS. 51 § 2011; OS 51 § 25 (THE (ORFA))
 VIOLATION OF RUZPA (RELIGIOUS LAND USE AND INSTITUTIONALIZED PERSONS ACT);
 42 U.S.C. § 2000 CC et seq. AND ARTICLE I, § 2 A STATE CONSTITUTION OF OKLAHOMA; ARTICLE 5,
 OS 57 § 5, AND THE FIRST AMENDMENT OF THE U.S. CONSTITUTION AND CONSTITUTIONAL AMENDMENTS
 14TH AND THE 8TH AMENDMENT RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT TO
 THE INDIFFERENT DILIGERANTLY WAYS I AM TREATED AS OPPOSE TO OTHERS, AND THE AMERICANS WITH
 DISABILITIES ACT 42 U.S.C. § 12101 et seq. (a) (8) AND 12131 et seq.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?
This action is brought under the aforementioned citations above

PB(R)

COUNT III CRUEL AND UNUSUAL PUNISHMENT - DENIAL OF MEDICATIONS:

Plaintiff Booked into Pawnee County Jail with Medications per his seizures on October 27th 2022, Jail policy "PRESCRIPTION MEDICATIONS" ENTITLED, STATES "If you are booked into jail with a narcotic medication you will be allowed to finish off the medication as prescribed until gone, you will not be allowed any refills and will have to put in a "TICKET" to the Provider to get a different medication to "Turn Key Providers" View the Xanax as a narcotic medication which is per Plaintiff's seizures.

Officials at the jail and Turn Key Providers allowed the Plaintiff from the dates October 27th To November 12th 2022 to be taken off the Anticonvulsant Medications NEURONTIN and Xanax, the Plaintiff was not given but was booked into the jail with, the officials allowed Plaintiff to lay in an isolation cell and have back to back seizures from the denial of his medication per his seizure disorder, both medications Plaintiff had possessed at booking, the Neurontin was never again located, only the Xanax which has been denied that could & prevented Plaintiff from the numerous seizures but the officials withheld medication for several weeks while Plaintiff had back to back seizures inflicting Cruel and Unusual Punishment ongoing, Jail officials and "Turn Key Providers" still elect to violate their own Policy by withholding the remaining medication from the Plaintiff who suffers from G.T.C. and P.N.E.S. Seizure disorders both Medications require "tapering off" of the Medications as there Withdrawals are severe, Plaintiff went without sufficient tapering off and experienced Very Cruel and unusual punishment at the hands of Officials

COMPLAINT SECTION II [B] - PAGE 3

AMMENDED CONTINUED COUNT I VIOLATION OF O.F.R.A. PAGE 3-~~4~~

Plaintiff when booked into the Paines County Jail during the dates August 28th 2021 to October 19th 2021, October 27th 2021 to September 23rd 2022, October 27th 2022 to February 10th 2023 to February 14th 2023, February 28th 2023 to March of 2023 advised the defendants of his chosen religion as a Messianic Jew and that he required an undegiled Kosher diet, Jimmy Steele responded to a request (THEN BEING A 2 INCH WIDE BY 8 1/2 SLIP OF PAPER THE I/M'S HAD TO USE AS A "REQUEST TO/OF STAFF THAT WAS NOT IN SIZE LARGE ENOUGH TO FILL ONE'S COMPLAINT) Plaintiff requested as to "WHY" he was not getting his KOSHER DIET, MR. Steele responded "WE DONT SERVE PORK YOUR GOOD", regardless as to whether or not the Paines County Jail served Pork or not, the food per a Kosher diet if in fact was a Kosher diet was not handled within the Jewish guidelines per an undegiled diet, Point in Case, in mid July / August 2022 an I/M ^{ANTHONY} Tony Ramon HALL in his anger because of the food being unacceptable and so small in portions defecated on one of the trays and sent it out with the lunch tray defiling everyone's diet and they been on a Kosher tray and jail staff seen and were aware of this taking place. Plaintiff sent out another slip of paper (USELESS) requesting per his Kosher diet, Jimmy Steele responded "YEAH OK!"

Grievances were filed, all of which disappeared each time and there was never no action taken, some of which ASHLEY TRENT marked AS REJECTED ON THE N.C.I.C COMMUNICATIONS KIOSK. which has now also disappeared but that Plaintiff has reference numbers to some of the grievances filed on this issue that were filed on the Jail KIOSK SOME OF WHICH HAVE DISAPPEARED AGAIN

COMPLAINT SECTION II [B] - PAGE 3

COMPLAINT PAGE 5

AMMENDED CONTINUED COUNT I VIOLATION OF O.F.R.A. Page 3 [B]

Plaintiff as well had conversations with Jimmy Steele when he was Jail Administrator at and up until he was "dismissed" as Jail Administrator (AND THERE HAS BEEN NUMEROUS JAIL ADMINISTRATORS THEREAFTER HIS DISMISSAL) their reasoning is unknown to Plaintiff but is expected there was some sort of soliciting products in addition to the Prisoner Commissary for monetary gain, possibly embezzlement as this County is well known for, Mr. Steele would comment that "all their food from Tiger Commissary is KOSHER" which is a false statement, Prisoners are fed meats (BY PRODUCTS) that specifically state on their labeling "NOT FIT FOR HUMAN CONSUMPTION" to include DEER OATS as a replacement for OATMEAL which also states "NOT FIT FOR HUMAN CONSUMPTION" but continues to be fed to its prisoners which is definitely not KOSHER.

MR STEELE would place ^{PLAINTIFF} prisoner as well in tumultuous situations with other inmates in an effort to get Plaintiff in fights over his religious beliefs and the "standing up for his Civil rights when no one else would —

Plaintiff as well had attempted to resolve his complaints with Mr Nick Mahoney, Mr. Mahoney and Sheriff Vannell neglected to answer Plaintiffs grievances, nor handle Plaintiffs complaints informally, there is no discipline in their food service department and still the claim is that all food from Tiger Commissary is KOSHER, and no certified KOSHER Cook, all food is handled by County trustees, Pawnee County Sheriffs Department fails to adequately train and supervise any of its jail staff and will hire any warm blooded individual that can perform / provide a service, Presumptively without proper background checks.

AMMENDMENT TO COUNT III - DENIAL OF MEDICATION/CRUEL UNUSUAL PUNISHMENT

ON January 18th 2023 Plaintiff went into a G.I.C. seizure at which time nurse Melody continued to break approximately 10 amnesia ampules and shove them in the plaintiffs nose inflicting cruel and unusual punishment while refusing to call emergency medical technicians and ^{DED NUMEROUS TIMES} conferring with doctor ^{MORDECAI} Mordecai as to whether or not to transport plaintiff to the hospital, Dr. ^{MORDECAI} Mordecai refused to allow orders to call an ambulance to send Plaintiff to the hospital numerous times during a 2+ hour time span in which Plaintiff was in convulsions and a full blown seizure that could of resulted in death as there was no immediate medical attention given to get Plaintiff to the hospital in their efforts to save the County money by waiting two+ hours before the decision was made to transport Plaintiff to the hospital after it was recognized that Plaintiff was unconscious and the first amnesia ampo still rendered Plaintiff in a state of unconsciousness, 10+ amnesia amples later and over two hours in passing the defendants finally called for an ambulance where he was rushed to the hospital and 1 hour later was sustained with Vempert back to consciousness and the defendants were ridiculed for putting the Plaintiff life in jeopardy leaving Plaintiff in a state of unconsciousness for over a two hour period, Plaintiffs motor skills have drastically slowed and the extent of permanent damage is at this time unknown due to inadequate medical treatment, a follow up was scheduled and the defendant Paines County Sheriffs office refused to send Plaintiff to the appointment, and per two days after Plaintiffs return Paines County Sheriffs department refused to give Plaintiff the medication sent back to sustain his seizures, Plaintiff continued to have "mini seizures" after coming back from the hospital and Plaintiff was ignored by staff AGAIN, AND STAFF TORMENTED PLAINTIFF AND NEGLECTED TO ADMINISTER MEDICATIONS

CONTINUED AMMENDMENT TO COUNT III SECTION II [B] Page 3

PRESCRIBED BY THE STILLWATER ATTENDING PHYSICIAN, TURN KEY MEDICAL PROVIDERS WERE NEGLIGENT WITH THEIR INADEQUATE MEDICAL TREATMENT OF PLAINTIFFS LENNOX GAUSTAUT SYNDROME

TURN KEY MEDICAL PROVIDERS CHARGE PLAINTIFF AND OTHER PRISONERS \$10⁰⁰ TO SPEAK WITH NURSING STAFF WHOM ARE VERY UNPROFESSIONAL IN THEIR CONDUCT, ATTITUDE AND DIAGNOSIS OF JAIL PRISONERS AS TO "WHETHER OR NOT" THEY ARE WORTHY OF BEING SCHEDULED TO SEE THEIR JAIL PHYSICIAN DR. MORDECAI AND THERE IS A 20⁰⁰ FEE AS WELL TO THIS PROVIDER IN WHICH IS DONE TELEVIDED, NO EXAM JUST CONVERSATION, THEREAFTER A CHARGE OF 10⁰⁰ PER PRESCRIPTION AND 2.50 PER WEEK TO DISPENSE PLAINTIFFS MEDICATION AT THE UNIT DOOR, THESE NURSES ARE EMPLOYED TO DO THE JOB BUT ARE NEVER HERE BUT 2 DAYS PER WEEK AND UNTRAINED JAIL STAFF PASS OUT THESE MEDICATIONS, THOUGH ITS THE NURSES RESPONSIBILITY TO ADMINISTER THE MEDICATIONS PLAINTIFF AND OTHERS ARE SOLEY AT THE HANDS OF JAILERS PASSING OUT THESE MEDICATIONS THAT ARE GENERALLY INCORRECT AT TIMES, PLAINTIFF SEVERAL TIMES HAD BEEN GIVEN SOMEONE ELSE'S MEDICATION THAT CAUSED HIS THROAT TO SWELL TO THE POINT HE COULD HARDLY BREATHE BEING UNAWARE OF WHAT WAS IN THE CRUSHED UP COCTAIL OF MEDICATIONS ADMINISTERED TO HIM, CRUSHED, AND SOME WHOLE PILLS NOT VIEWABLE MIXED WITH THE CRUSH ORDERED PILLS

PLAINTIFFS AND OTHERS MEDICAID / BLUE CROSS AND BLUE SHEILD INSURANCE COVERS THESE MEDICAL SERVICES, BY AND THROUGH THE STATE AND THE DEFENDANTS CHARGE THE INMATES FROM THEIR COMMISSARY ACCOUNTS AND AGAIN ADD THEM TO THEIR COURT COSTS DENYING THAT THIS IS NOT THE CASE IN REFERENCE TO THEIR CHARGES

COMPLAINT SECTION II [B] - PAGE 3

COUNT II
CONDITIONS OF CONFINEMENTCOMPLAINT PAGE 8
Page 3 d

DURING THE DATES PLAINTIFF WAS INCARCERATED WITHIN THE PAWNEE COUNTY JAIL AUGUST 28th 2021 TO OCTOBER 19th 2021, OCTOBER 27th 2021 TO SEPTEMBER 23rd 2022, OCTOBER 27th 2022 TO FEBRUARY 10th 2023, FEBRUARY 14th 2023 TO MARCH 24th 2023 THIS PLAINTIFF ENDURED THE FOLLOWING CONDITIONS UNDER JAIL ADMINISTRATOR'S WHOM WERE UNCERTIFIED FOR THE POSITION

① FOOD RATIONS > JAIL ADMINISTRATOR CODY LEWIS (PRIOR J.A. FROM PAYNE COUNTY) TOLD TRUSTEE TERRY SPARKS TO CUT THE RATIONS OF FOOD ON E UNIT IN HALF, PEOPLE CONTINUED TO LOSE WEIGHT, I/m's ON E UNIT WERE LOCKED DOWN IN THEIR CELLS FOR DAYS ON END BECAUSE HE WAS MAD, WATER WAS SHUT OFF FOR DAYS, (BROWN WATER) I/m's WERE FORCED TO DRINK TO SUSTAIN LIFE, AND AN OLDER BLACK MAN WAS PLACED IN CELL 5 WITH ANOTHER I/m THAT HAD MERSA. MR. LEWIS WAS SUBSEQUENTLY FIRED FOR AN ARRAY OF INCONSISTENCIES RELATED TO HIS EMPLOYMENT BOTH FROM PAWNEE COUNTY AND PAYNE COUNTY JAIL.

GRIEVANCES I/m's FILED TO INCLUDE PLAINTIFFS WERE NEVER RESPONDED TO BY THE J.A., UNDERSHERIFF NOR THE SHERIFF THE FOOD BUDGET BOTH FOR STATE AND FEDERAL I/m's (THE PAWNEE COUNTY JAIL CONTRACTED TO HOUSE FEDERAL I/m's AND THEREAFTER THE COUNTY LOST THEIR CONTRACT DUE TO THE VOLUMINOUS COMPLAINTS FEDERAL AUTHORITIES RECEIVED). HAD TO OF BEING DIVERTED AND TO DATE THE PROBLEMS WITH THE FOOD CONTINUES TO ESCALATE DOWNHILL AND TO DATE PLAINTIFF KOSHER DIET HAS NEVER BEEN GIVEN/AFFORDED, ADHERED THERETO, BUT I/m's WHO REQUEST NO BEANS, NO ONIONS, NO TOMATOES ETC. ARE BEING GIVEN TO I/m's AS A FOOD ALLERGEN WITHOUT BEING GIVEN AN S.A.R. TEST

COMPLAINT SECTION II [B] - PAGE 3

COUNT II

CONDITIONS OF CONFINEMENT

COMPLAINT PAGE 9

PAGE 3 e

PLAINTIFFS AND OTHERS ATTORNEYS HAD/HAVE PROBLEMS WITH THE SHERIFF'S OFFICE AND ITS EMPLOYEES THEREOF HAVE PROBLEMS WITH UNRULY STAFF IN SCHEDULING ATTORNEY VISITS AND LEGAL CALLS, JAIL STAFF NOT ANSWERING INCOMING CALLS IGNORING INCOMING CALLS FROM THE PUBLIC SEEKING INFORMATION CONCERNING CHARGES, BOND, AND PUBLIC INFORMATION WHILE SITTING AT THE BOOKING DESK (JAILERS) NOT DOING THEIR JOBS SURFING THE INTERNET FOR PERSONAL ISSUES OR WATCHING MOVIES ON COUNTY TIME, THIS CONTINUES TO BE ONGOING BEHAVIOR.

PLAINTIFF ENDURED AS WELL AS OTHERS COLD SHOWERS DURING ^{TWO WINTERS IN A ROW} THE WINTER MONTHS OF 2021, 2022 DUE TO PLUMBING PROBLEMS WITHIN THE JAIL, THE BOARD OF COUNTY COMMISSIONERS REFUSED TO ADDRESS THESE PROBLEMS, NOR HIRE A LICENSED PLUMBER TO RECTIFY THESE PROBLEMS WHICH INFLECTED CRUEL AND UNUSUAL PUNISHMENT UPON PLAINTIFF AND OTHER I/M'S CONFINED WITHIN THE PAWNEE COUNTY JAIL, PROBLEMS ALSO AROSE WITH TOILETS, SINKS CONTAMINATED TRASH CANS SPECIFICALLY ON E-UNIT

PLAINTIFF AS WELL WHEN PLACED IN AN ISOLATION CELL COULD HARDLY DRAW WATER FROM THE SINK, DEFENDANTS IGNORED PLAINTIFF'S GRIEVANCES, AND FAILED TO PERFORM VISUAL CHECKS, ROTATIONS, RECORDS WITHIN THE PRESCRIBED TIMES IN ACCORDANCE TO STATE AND FEDERAL STANDARDS

Plaintiff Complaint in Violation of U.S. Constitutional amendments 4, 8, and 14 and Oklahoma Constitution art. II, 9, and 30 and other applicable statutes the Court may construe in light most favorable as Plaintiff is a layman of law
HAINES V KERNER HALL V BELLMON

CONTINUED COUNTS - SECTION II (B) (PG 9)(A)

COUNT II ASSAULT AND BATTERY - "ON OR ABOUT" THE 18th OF NOVEMBER 2022 ~~[ON OR ABOUT]~~ PLAINTIFF WAS INTENTIONALLY ASSAULTED AND BATTERED FOR NO APPARENT LOGICAL REASON BY A ONE DOUG GROVE-MILLER WITH A NON LETHAL TAZER GUN TWICE POINT BLANK RANGE WHILE BY-STANDER EMPLOYEE WILLIAM HATHORN WATCHED AND DISAGREED OF MR. GROVE MILLER'S TWICE TAZED PLAINTIFF WHILE IN AN ISOLATION CELL NAHED. THE ASSAULT WAS CAPTURED VIDEO /AUDIO AND BODY CAM FOOTAGE BOTH EMPLOYEES FILED S.I.R.'S - SERIOUS INCIDENT REPORTS IN WHICH THE DEFENDANT PAWNEE COUNTY SHERIFFS OFFICE DENY PLAINTIFF A COPY THEREOF TO ASCERTAIN THE EXACT DATE OF PLAINTIFF ASSAULT AND BATTERY AS THE TAZER CONTACT RENDERED UNCONSCIOUSNESS FOR SEVERAL DAYS IN DELIRIUM STATE AFTERWARDS.

* THE TIME AND DATE HAS NOW BEEN ESTABLISHED AS 11-21-22 @ 21:50 HRS. PLAINTIFFS ENTIRE LEFT SIDE HAS GONE NUMB, AND THE INCIDENT HAS CAUSED NERVE DAMAGE TO THE EXTENT PLAINTIFF'S LEFT FOOT CONTINUES TO DRAG AS IF A "STROKE" OCCURED, BOTH SHOULDERS FEEL FUSED AND SEPERATED FROM THE BONE TO THE EXTENT THAT DIFFICULTY IN RAISING BOTH ARMS CAUSES EX- CRUCIATING PAIN AS IF BOTH SHOULDERS ARE BROKEN AND LEAVES PLAINTIFF WITH MENTAL ISSUES. PLAINTIFF AS WELL EXPERIENCES NIGHT TERRORS OF BEING ASSAULTED AND DID NOT RECIEVE ANY MEDICAL ATTENTION FOR SEVERAL WEEKS AFTERWARDS STAFF INTENTIONALLY HAVE NOT SUPPLIED PLAINTIFF WITH THE S.O.I.R. SERIOUS INCIDENT REPORT FOR THE APPROXIMATE TIME AND DATE* HAS NOW BEEN ESTABLISHED* SIPS STILL REMAIN UNAVAILABLE

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CONTINUED SECTION II, PARA. B > EXCESSIVE USE OF NON-LETHAL FORCE/ASSAULT AND BATTERY SEE ATTACHED

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

THE DEFENDANTS ACTED UNDER COLOR OF STATE AND FEDERAL LAW IN THEIR OFFICIAL AND INDIVIDUAL PERSONAL CAPACITIES WHEN AND BEFORE THE ALLEGATIONS ASSERTED AROSE BY ASSAULTING AND BATTERING MY PERSON FOR NO APPARENT REASONING AND BY WITHHOLDING MY RELIGIOUS DIET, BIBLE AND WORSHIP SERVICES, AND BY THE DELIBERATE INDIFFERENCE TO WAYS I AM BEING TREATED AS OPPOSED TO OTHERS BY JAIL STAFF THAT PUTS ME IN IMMEDIATE DANGER DUE TO MY RELIGIOUS BELIEFS AND THE WAYS THEY TREAT ME AS A HUMAN BEING WITH MENTAL AND PHYSICAL DISABILITIES UNDER THE AMERICANS WITH DISABILITIES ACT 42 U.S.C. § 12101 et. seq (a) (8)

- III. Prisoner Status OFFICIALS DENIED PLAINTIFF HIS SECURE MEDICATIONS TO CONTROL SEIZURES

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (explain) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

They arose while inside the institution and in an isolation cell

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

They arose while being detained in the Paines County Jail from August 28th 2021 to the date of the filing of this Complaint and continues ongoing

The assault and battery arose on 11-21-2022 @ 21:50 hrs. in an isolation cell while partially naked

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C. What date and approximate time did the events giving rise to your claim(s) occur?

(2022)
 AUGUST 28th 2021 TO OCTOBER 19th 2021 (10:30 PM); OCTOBER 27th 2021 TO SEPTEMBER 21st (10:00 PM);
 OCTOBER 27th 2022 TO THE DATE OF FILING OF MY COMPLAINT (ONGOING VIOLATION OF MY CIVIL RIGHTS)
 THE YEAR OF 2023 THE FILING OF THIS COMPLAINT THE PERSONAL INJURIES CONTINUE ONGOING
 The assault and battery occurred on 11-21-2022 @ 21:50 hrs, while partially naked in an
 isolation cell

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?

Was anyone else involved? Who else saw what happened?) I AM BEING DENIED MY RIGHT TO EXERCISE
 MY RELIGION; THE DEFENDANTS ARE NOT ALLOWING PLAINTIFF A KOSHER DIET NOR A TANAKA, NOR
 MESSIANIC JEWISH SERVICES, NOR ALLOWING PLAINTIFFS CORRESPONDENCE TO THE TABERNACLE AND RABBI WHEN
 SENT OUT OF THE JAIL IN THE U.S. MAIL THE CORRESPONDENCE NEVER LEAVES THE JAIL AND IS OFTEN PLACED IN MY PROPERTY BAGS
 what happened to me was I was assaulted and battered with the use of non lethal excessive force while
 naked in an isolation cell, who did it, were Doug Spivey-Miller and William Hawthorne, who also was
 involved, was Mr. Hawthorne whom tried his best to help me; who else saw what happened: WILLIAM
 HAWTHORNE AND the entire jail staff reviewed camera footage of my incident as well as body camera and
 staff were and are required to wear, also involved as lay standers are William Hawthorne / Cameron Derr
 I was denied all my seizure medications for several weeks and was thereafter placed on the wrong medications
 V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical
 treatment, if any, you required and did or did not receive. MY RELIGION; MY DIET; AND MY SPIRIT HAVE BEEN

DEFILED / DEFOULLED BY THE DEFENDANTS DUE TO THE STRICT-NON COMPLIANCE OF MY DIET DENIAL;
 THE DENIAL OF THE BIBLE OF MY CHOSEN RELIGION (TANAKA) AND MESSIANIC JEWISH SERVICES
 Pertaining to my claim under the Oklahoma religious freedom act (O.R.F.A) INJURIES SUSTAINED

in relation to the assault and battery, I was not given any medical attention until November 3
 2022, my injuries are: I now have difficulty walking, and feel like my insides are fried; both my
 shoulders and muscles in my body have been damaged; I am having mental issues related to my
 being taped by the police, the incident has caused me night terrors, insomnia, and extreme anxiety
 which remains untreated the incident occurred on 11-21-22 @ 21:50 hrs. Camera footage
 I secured from Oklahoma Department of Corrections by the withholding of my seizure medications by jail official
 VI. Relief and Turn Key Medical from October 27th 2022 to 11-30-2022.

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes.

If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for
 the acts alleged. Explain the basis for these claims. \$1000.00 PER DAY FOR EVERY DAY PLAINTIFF HAS BEEN

FORCED / SUBJECTED TO EAT FOUL / DEFILED FOOD. ACTUAL DAMAGES: ORFA RUZIPA
 \$1000.00 PER DAY ACTUAL DAMAGES FOR DENIAL OF A BIBLE OF MY CHOSEN RELIGION. 055755
 1000.00 PER DAY ACTUAL DAMAGES FOR DENIAL OF MESSIANIC WORSHIP SERVICES.
 1000.00 PER DAY ACTUAL DAMAGES FOR THE DEPRIVAL OF U.S. MAIL TO MY RABBI BEING DESTINED THERE TO
 PUNITIVE, COMPENSATORY, NOMINAL AND INJUNCTIVE RELIEF DAMAGES

FOR THE ASSAULT AND BATTERY, I'm asked of 25,000 dollars, PUNITIVE, COMPENSATORY, NOMINAL AM
 INJUNCTIVE RELIEF DAMAGES

FOR THE DENIAL OF THE WITHHOLDING OF MY SEIZURE MEDICATIONS IN EXCESS OF 25,000 DOLLARS, PUNITIVE,
 COMPENSATORY, NOMINAL AND INJUNCTIVE RELIEF DAMAGES

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VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

I have diligently pursued to exhaust my administrative remedies but the defendants refuse to allow me to exhaust my grievances just disappear after I submit them to authorities
 Administrative remedies are also known as grievance procedures. If the evidence shows that you did not fully comply with an available prison grievance process before filing this lawsuit, the Court may dismiss the unexhausted claim(s) or grant judgment against you. *It is not my fault the defendants will not allow me to exhaust, and I have allowed them ample time to handle my complaint informally, by verbally speaking with them first, and submitting a request to staff to informally handle my complaint, still grievances unresolved*

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

I am being ridiculed by authorities and harassed because of my religious beliefs and stuff puts me in imminent danger by placing me in harm's way with other I.
 To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

NOT APPLICABLE TO ME

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☒ Yes☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s)

~~N/A~~ TOBIN LEMMONS

Defendant(s)

~~N/A~~ PAWnee COURT BOARD OF COUNTY COMMISSIONERS,
PAWnee COUNTY SHERIFFS OFFICE/JAIL GOVERNMENTAL TORT CLAIM

PRIS-14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner) (Mod 7/19)

2. Court (if federal court, name the district; if state court, name the county and State)

N/A PAWNEE COUNTY DISTRICT COURT PAWNEE OKLAHOMA OFFICE OF RISK MANAGEMENT AND ENTERPRISE SERVICES OKLAHOMA CITY/OKLAHOMA COUNTY

3. Docket or index number

N/A UNKNOWN

4. Name of Judge assigned to your case

N/A UNKNOWN

5. Approximate date of filing lawsuit

N/A 01-05-2023 APPROX

6. Is the case still pending?

The last lawsuit I filed was in 2011 on Pawnee County Jail Case Number CIV 00500-CVE in the Northern District of Oklahoma in 2011
☒ Yes I have filed with the office of Risk Management and Enterprise Ser
 AND ☒ No and the Board of County Commissioners a Governmental Tort Claim under 05 51 § 151, 05 51 § 251.
 If no, give the approximate date of disposition. N/A PENDING

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

N/A Pending Tort Claim for Personal Injuries in excess of \$10,000 in State Court

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☒ Yes SEE ABOVE VIII (B), 6. a Governmental Tort claim

☐ No

- D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) TOBIN DON LEMMONS NORTHERN DIST OF OKLA.

Defendant(s) V. WATERS; PAWNEE COUNTY SHERIFF'S OFFICE, PAWNEE COUNTY JAIL

Sheriff Darrin Vannell Pawnee County Jail, Pawnee County, Pawnee Oklahoma

2. Court (if federal court, name the district; if state court, name the county and State)

Pawnee County district Court, Pawnee County Jail, Pawnee County, Pawnee County, Risk Management and Enterprise Services, Oklahoma County, Oklahoma City, Oklahoma

PRIS-14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner) (Mod 7/19)

PRO SE

U.S. NORTHERN DISTRICT COURT FOR THE STATE OF OKLAHOMA

STATE GOVERNMENTAL TORT CLAIM

3. Docket or index number

CIV - 00500 - CVE

UNKNOWN PENDING

4. Name of Judge assigned to your case

CLAIRE EGAN

UNKNOWN FILED TO MS. JANNET MORROW

5. Approximate date of filing lawsuit

August 2011

01-05-2023

6. Is the case still pending?

☒ Yes GOVERNMENTAL TORT CLAIM PENDING☒ No WATERS V. STATE DISMISSED APPEALED TO 10th CIRCUIT, LATER DISMISSED

If no, give the approximate date of disposition

2014? Not sure TORT CLAIM PENDING

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Dismissed for failure to exhaust administrative remedies, andI appealed to 10th Circuit Court of appeals, even though it was of no fault of my own that the defendants would not allow me to exhaust just like they are now doing me again, knowing that if I can't exhaust then my suit will be dismissed

IX.

Certification and Closing

* I need court to order defendants to allow me answers to my grievances to further move forward with my complaint, otherwise they won't answer grievances

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

Tom Jenkins

PRIS-14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner) (Mod 7/19)

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

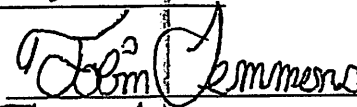
Date of signing: 01-15-2023

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address



TOBIN LEMMONS

003202

500 HARRISON

PAWNEE

OKLA

74058

City

State

Zip Code

B. For AttorneysDate of signing: N/A

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

PRO-SE AT TIME OF FILING

N/A

N/A

N/A

N/A

N/A

City

N/A

State

N/A

Zip Code

Telephone Number

E-mail Address

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares (or certifies, verifies, or states) under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. §1746. 18 U.S.C. §1621.

Executed at PAWNEE COUNTY JAIL, PAWNEE OKLAHOMA on 01-11-2023
(Location) (Date)



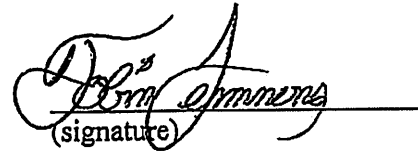
Original Signature of Plaintiff)

I hereby certify that a copy of the foregoing pleading/document

was mailed to DEFENDANT LAWLEE COUNTY JAIL
(opposing party or counsel)

at 500 HARRISON STR LAWLEE OKLAHOMA 74058
(address)

on 06-07-2023, 2023.
~~01-11-2023~~


(signature)

Instructions For Summons.

- (1) Your name.
- (2) Name of the first defendant in your civil rights complaint.
- (3) Name and address of the individual defendant you wish to sue. (You are reminded that you must fill out a separate summons for each named defendant you wish to sue.)
- (4) Your name and address.

Instructions for USM-285 Form.

- (1) Your name.
- (2) Name of the first defendant in your civil rights complaint.
- (3) Name and address of the individual defendant you wish to sue. (You are reminded that you must fill out a separate USM-285 Form for each named defendant you wish to sue.)
- (4) Your name and address.
- (5) Sign and check the appropriate box. Unless you sign each USM-285 Form, the Clerk will not forward it to the Marshal for service.

To: MS. KELLY TRAMMEL / JERRY SKIDGEL Date: 03-26-2023Name and title of staff member K. Trammel JAIL Administrator / Jerry Skidgel County Commissioner

I have ☒ have not ☐ already submitted a "Request to Staff" or grievance on this same issue. If yes, date facility Primer County Sheriff's Det. grievance # . I affirm that I do ☒ do not ☐ have a grievance pending on this issue. I affirm that I do ☒ Do not ☐ have a lawsuit of any type pending that in any way to this issue.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff". Your failure to specifically state your problem may result in this being returned unanswered. Grievances were responded to on 2-27-2023 and I requested to further my appeal

As I previously stated on the Kiosk and by means of receiving U.S. mail on 2-27-2023 the grievances that were responded to that I wished to further appeal to the undersheriff Nick Mahoney, and Sheriff Darrin Kimmell, the responses by the aforementioned have never disagreed with their responses and I request to know why they were not responded to when they were assigned to Nick Mahoney for the final appeal in which there is no appeal form to further one's appeal to the next stage of the grievance process. Please allow me a signature to exempt (USE OTHER SIDE IF MORE SPACE IS NEEDED)

ACTION REQUESTED: State exactly how you believe your request may be handled, that is, what exactly should be done and how.

That my grievances (3 separate grievances) be responded to a signed copy on by the undersheriff and the Sheriff, as there is no "grievance appeal form" to each of these steps of the grievance process to allow the prisoner to dispute their issues further after the Jail Administrator responds to one's grievable issue.

And that a grievance appeal form be readily available to a prisoner to further dispute and appeal one's issues to the point of exhaustion

Name: (print please):

TOBIN LEMMONS

Signature:

Tobin Lemmons

DO NOT WRITE BELOW THIS LINE

Disposition:

STAFF MEMBER

DATE



PAWNEE COUNTY SHERIFF'S OFFICE
GRIEVANCE FORM

TODAY'S DATE: 12-08-2022

SPECIFY TYPE OF GRIEVANCE AND CIRCUMSTANCES SURROUNDING IT: CONDITION OF CONFINEMENT

THE CIRCUMSTANCES SURROUNDING MY ISSUE IS THAT I AM A MESSIANIC JEW, AND I HAVE SPOKEN WITH STAFF FIRST ABOUT MY ISSUE CONCERNING A KOSHER UNDEFILED DIET, I HAVE PUT IN SEVERAL REQUEST TO STAFF ON NCIC KIOSK ALL OF WHICH HAVE BEEN REJECTED AND LISTED AS RESOLVED UNSUBSTANTIATED BY AN UNKNOWN JAIL OFFICIAL WHEN ITS NOT RESOLVED. NCIC KIOSK TH#UH2 cI Pzp W4Dh; BAT#0J3 pyHP; MCCWZHJ5QmOI

PLEASE USE THE BACK IF MORE ROOM IS NEEDED

DATE OF INCIDENT: 12-08-2022

TIME OF INCIDENT: 10:00 pm

TOBEN D. LEMMONS

[Signature]
SIGNATURE OF INMATE

PRINT NAME OF INMATE

BELOW FOR OFFICE USE ONLY

CELL GRIEVANCE CAME FROM: _____

TIME: _____

ADMINISTRATOR INVESTIGATIVE COMMENTS:

Our food provider (Tiger) is based on a kosher diet but doesn't offer pre-made meals

JAIL ADMINISTRATOR Kelly Trammell
Jimmy Steele: [Signature]

DATE: 2.24.23

RECOMMENDED ACTION:

GRIEVANCE OUTCOME:

☐ FOUNDED

☒ UNFOUNDED

☐ SEE BELOW

1ST APPEAL NICK MAHONEY

DATE: _____

2ND APPEAL:

SHERIFF DARRIN VARNELL

DATE: _____



PAWNEE COUNTY SHERIFF'S OFFICE
GRIEVANCE FORM

TODAY'S DATE: 12-08-2022

SPECIFY TYPE OF GRIEVANCE AND CIRCUMSTANCES SURROUNDING IT: CONDITION OF CONFINEMENT

I HAVE REQUESTED FOR A BIBLE OF MY CHOSEN RELIGION, I AM A MESSIANIC JEW, MY BIBLE IS A TANAKA, I HAVE SPOKEN WITH JOHNNIE WAGONER ABOUT THIS TO HANDLE MY COMPLAINT INFORMALLY, AND I HAVE FILED A REQUEST TO STAFF WHICH WAS REJECTED BY UNKNOWN JAIL OFFICIAL, I NOW AM FILING MY DOCUMENTED GRIEVANCE ON MY ISSUE FOR RESPONSE

REQUESTS NCTC KIOSK TR# MCCWZHJSQm01 AND TR# KX1Y1JrmQD
PLEASE USE THE BACK IF MORE ROOM IS NEEDED

DATE OF INCIDENT: 12-08-2022

TIME OF INCIDENT: 10:05 PM

TOBIN A. LEMMONS

PRINT NAME OF INMATE

SIGNATURE OF INMATE

BELOW FOR OFFICE USE ONLY

CELL GRIEVANCE CAME FROM: _____

TIME: _____

ADMINISTRATOR INVESTIGATIVE COMMENTS: Copies of grievances given to me by Tobin on 02-22-23, first time hearing of this

JAIL ADMINISTRATOR Kelly Trammell Kelly Trammell

DATE: 02-24-23

RECOMMENDED ACTION:

GRIEVANCE OUTCOME:

☐ FOUNDED

☒ UNFOUNDED

☐ SEE BELOW

1ST APPEAL NICK MAHONEY

DATE: _____

2ND APPEAL:

SHERIFF DARRIN VARNELL

DATE: _____



PAWNEE COUNTY SHERIFF'S OFFICE
GRIEVANCE FORM

TODAY'S DATE: 12-01-2022

SPECIFY TYPE OF GRIEVANCE AND CIRCUMSTANCES SURROUNDING IT: EXCESSIVE USE OF NON-

LETHAL FORCE / ASSAULT AND BATTERY - ON OR ABOUT THE WEEK AFTER THE WEEK
OF THE 7th DAY OF NOVEMBER 2022, JAILER KNOWN TO ME AS "DOUG" TWICE TAZED
ME IN THE ISOLATION (ISO 2) CELL FOR NO REASON AT POINT BLANK RANGE IN THE
PRESENCE OF JAILER KNOWN TO ME AS WILLIAM (WILL), JAILER DOUG STRIPPED
ME AND LEFT ME IN THE CELL NAKED, I HAVE SINCE BEEN IMPAIRED BY THE LIMITED
MOVEMENT OF BOTH SHOULDERS AND LEFT FOOT, MY ENTIRE LEFT SIDE IS NUMB
PLEASE USE THE BACK IF MORE ROOM IS NEEDED over →

DATE OF INCIDENT: 11-12-2022

TIME OF INCIDENT: 21:50 hrs.

TORIN LEMMONS
PRINT NAME OF INMATE

Torin Lemmons
SIGNATURE OF INMATE

BELOW FOR OFFICE USE ONLY

CELL GRIEVANCE CAME FROM: E PO

TIME: _____

ADMINISTRATOR INVESTIGATIVE COMMENTS: issue was resolved by the termination
of Douglas Giner-Miller. Mr. Lemmons can get a copy
of reports from front offices

JAIL ADMINISTRATOR Kelly Trammell
Jimmy Steele: Kelly Trammell

DATE: 09-24-23

RECOMMENDED ACTION:

GRIEVANCE OUTCOME:

☐ FOUNDED

☒ UNFOUNDED

☐ SEE BELOW

1ST APPEAL NICK MAHONEY

DATE: _____

2ND APPEAL:

SHERIFF DARRIN VARNELL

DATE: _____

and I have nerve, tendon and ligament damage to the extent that I cannot exercise, on both my arms without experiencing excruciating pain, I was withdrawing from my drugs medications NEURONTIN and Xanax cold turkey, medicines I was supposed to be been gradually "weaned" off of but administration initiation of the new provider to but I was left to struggle with my withdrawals by quit stuff while having back to back

I have sought to obtain the names of Mr. Doug / Mr. Will, and the exact date I was assaulted through various staff members whom deny me this information or any information concerning incident, I was assaulted by Mr. Doug according to what information I was able to obtain I am told I was assaulted, Mr. Will did not participate in any of the sequence of events was put through, he did tell me he made a report on 'Mr. Doug' and called the Sheriff Darin Vannell, and undersheriff Nick Mahoney because what he did was most right, I was targeted so hard (twice) at point blank range that there has been much harm to my person I was not given any medical attention until Wednesday November 30th at which time there was nothing done to help me with being assaulted / Targeted.

After happened in the isolation cell, prior to this I was up front in medical observation and is / should be camera footage of the events leading up to / and following the events that took place on date they occurred, both jailers have body cameras also, and there should be footage of this as when it occurred, date is uncertain because staff is uncooperative with me and because I was twice point blank range, it had knocked me into a state of delirium for days, I still have not rec from as of the writing of my grievance, staff has to my knowledge 30 days from the date my grievance has be submitted to give me a response.

NCIC, KIOSK FILEINGS

I filed Kiosk requests and grievances numbered / DATED AS FOLLOW

11-21 - GRIEVANCE #TK1AQIJcTZGzLF

11-25 - MEDICAL #TK-1Vc7WanL1BV3

11-25 - MEDICAL #TK-9GR1EOSFX1qW

I have followed grievance procedure by filing a request to staff within 16 of the incident, the request was never responded

JOHN LEMMONS
Pondus County Jail
500 Harrison
Pondus Okla. 74058

RECEIVED

JUN 09 2023

Mark G. McGrath, Clerk
U.S. DISTRICT COURT

LEGAL MAIL

03019. CVE-CDL

U.S. DISTRICT COURT
For The Northern District of Okla.
333 West Fourth St. Room 411
Tulsa Oklahoma 74103-3819

postmark 6/7/2023 nt



LEGAL MAIL